

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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June 30, 2009

TO: Internal File

THRU: James D. Smith, Permit Supervisor *DS 07/01/09*

FROM: April A. Abate, Environmental Scientist II *AAA 6-30-2009*

RE: Savage Road Changes, Savage Services Corporation, Savage Coal Terminal, C007/0022 Task #3340

## SUMMARY:

On June 8, 2009, the Permittee, Savage Services Corporation (Savage) submitted an application to modify the existing MRP to include the elimination of Truck Dump No. 5 and its associated road, PR-8. The application also seeks to relocate existing road PR-7 slightly further to west. The culvert known as C-16 under PR-8 will be removed and culvert C-4 will be relocated to provide better drainage under road PR-7. The removal of Truck Dump No. 5, road PR-8 and culvert C-16 will reduce the reclamation cost estimate for the permit area.

Conditional approval of this application should be granted upon submission of clean copies and revisions to the bond calculations and spreadsheet in Appendix 8-1 of the Savage MRP.

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**TECHNICAL ANALYSIS:**

**MAPS, PLANS, AND CROSS SECTIONS OF RESOURCE INFORMATION**

Regulatory Reference: 30 CFR 783.24, 783.25; R645-301-323, -301-411, -301-521, -301-622, -301-722, -301-731.

**Analysis:**

**Existing Structures and Facilities Maps**

The Permittee provided an updated Facility Map (Plate No. 5-2) with their application showing the relocated road in the central portion of the site and to the west of the stock pile area.

**Surface and Subsurface Manmade Features Maps**

The Permittee provided an updated Road Map (Plate 5-4) with their application showing all the roadways within the permit area. A relocated PR-7 is shown southwest and adjacent to the coal storage area. PR-8 has been completely removed from the map along with Truck Dump No. 5.

**Surface Water Resource Maps**

The Permittee provided an updated Hydrology Map (Plate 7-2) with their application showing culvert C-4 in its relocated position beneath road PR-7. Culvert CR-4 is shown as draining to culvert C-2 that ultimately discharges to Sediment Pond 5 on the east side of the site. Culvert C-16 has been eliminated from the map.

**Findings:**

The updated plans submitted meet the R645 Coal Rules.

**OPERATION PLAN**

**ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES**

Regulatory Reference: R645-301-534

**Analysis:**

The operation, maintenance and reclamation of road are addressed in section 534.100 of the Savage MRP. Road PR-8 has been eliminated from the MRP on page 5 within this section. Page 7 of this section specifies all the performance standards that are to be met for the design, construction, maintenance and reclamation of roads.

**Findings:**

This section meets the R645 Coal Rules.

**HYDROLOGIC INFORMATION**

Regulatory Reference: R645-301-742.423, 301-762.100

**Analysis:**

**Drainage Control:**

Road Drainage is addressed in sections 742.423.1 & 2. Ditches and culverts associated with the roads on the site are designed to handle peak runoff from the 10-year- 24-hour precipitation event.

**Discharge Structures**

The Permittee submitted with their application an updated Table 7-25 showing the removal of culvert C-16 and the sizing updates to culvert C-4.

**Findings:**

This section meets the R645 Coal Rules.

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## RECLAMATION PLAN

### GENERAL REQUIREMENTS

Regulatory Reference: R645-301-541, 750, 762

**Analysis:**

The MRP addresses reclamation plans for the site including the statement that all roads are to be eventually reclaimed.

**Findings:**

This section meets the R645 Coal Rules.

### BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:**

The removal of Truck Dump No. 5, road PR-8 and culvert C-16 will reduce the reclamation cost estimate for the permit area.

**Findings:**

The Permittee did not submit an update to the bond calculations and spreadsheet located in Appendix 8-1 of the Savage MRP reflecting these changes.

**RECOMMENDATIONS:**

Conditional approval of this application should be granted upon submission of clean copies and revisions to the bond calculations and spreadsheet for Appendix 8-1.